
 **EFILED IN OFFICE**  
CLERK OF SUPERIOR COURT  
BRYAN COUNTY, GEORGIA  
**SUV2024000312**  
GC  
**JUL 30, 2024 03:46 PM**  
  
Rebecca Crowe, Clerk  
Bryan County, Georgia

**IN THE SUPERIOR COURT OF BRYAN COUNTY  
STATE OF GEORGIA**

**JOEL BERNIER PASKAUSKAS, III**

Plaintiff,

vs.

**BRYAN COUNTY, GA**

Defendants.

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**CIVIL ACTION NO. \_\_\_\_\_**

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**COMPLAINT**

COMES NOW, the Plaintiff, Joel Bernier Paskauskas, III, and brings this lawsuit against Defendant Bryan County, Ga., for Bryan County Fire and Emergency Services' violation of plaintiff's and county residents' First Amendment rights by blocking comments and disabling posts on official government social media pages.

**Parties**

1. Plaintiff, Joel Bernier Paskauskas, III, is a resident of Richmond Hill, GA, located in Bryan County, Ga.
2. Defendant Bryan County ("County") is a county governmental in the state of Georgia.
3. Bryan County Fire and Emergency Services ("BCFES") is a department or agency of Defendant Bryan County, Ga.

**Jurisdiction and Venue**

4. Jurisdiction and venue are proper in this Court as the events occurred within Bryan County, Georgia, and involve government entities operating within this jurisdiction.

### **Violations of First Amendment**

5. On July 18, 2024, Bryan County posted a message to county residents on its official Facebook page. Ex. A
6. The County disabled all comments or abilities to interact with the post. Ex. A
7. On July 26, 2024, Bryan County Fire and Emergency Services posted a message to county residents on its official Facebook page. Ex. B
8. After some comments were made, BCFES disabled comments on that post. Ex. B
9. At no time did the posts offer residents other avenues to engage on these public messages.
10. These actions followed recent public outcry regarding understaffing at BCFES and potential loss of life or property due to the staffing shortages.
11. The posts were related to the staffing concerns and situational report after a weather event.
12. By disabling comments on posts related to topics that were under scrutiny by local residents, the County engaged in restriction and regulation of viewpoint-related speech.
13. By disabling comments on posts related to specific topics of importance to county residents, the County engaged in restriction and regulation of content-based speech.
14. The county's viewpoint and content discrimination denied residents the opportunities to interact with official government messages or leaders in a public forum.
15. The First Amendment guarantees that government will not prohibit the free exercise of speech or to petition the government for redress of grievances.
16. Official government social media pages are public forums.

### **Evidence**

Screenshots: Documenting the blocked comments and disabled posts.

Correspondence: Emails and messages sent to the Bryan County Government and Emergency Services requesting explanation and reinstatement of commenting rights. Ex. C and D

**Prayers for Relief**

WHEREFORE, Plaintiff respectfully offers that without Court intervention this violative behavior is likely to recur and requests that this Court grant the following relief to ensure government accountability and transparency:

1. a finding that the defendant county violated the First Amendment rights of its citizens
2. injunctive relief compelling defendant to reinstate citizens' commenting rights on the Bryan County Government and Bryan County Fire and Emergency Services Facebook pages

Respectfully submitted this 30th day of July, 2024

/s/ Joel Bernier Paskauskas, III  
Plaintiff and Bryan County resident

*Pro se*

*EXHIBIT A*

Chrome File Edit View History Bookmarks Profiles Tab Window Help

(2) Facebook

facebook.com/BryanCounty

ADP BCFES BC CADS CGPT FB Imagetrend IG JM Wix JM Web LinkedIn MakeShift TRW Main X USAA

Search Facebook

Bryan County, Georgia

**Intro**

- Page · Government organization
- 51 North Courthouse St, Pembroke, GA, United States, Georgia
- (912) 653-5252
- bryancountyga.gov
- Open now

**Photos** See all photos

SCAM

SAFETY PLAN WORKSHEET

Bryan County Government

CLUBBIE IN SERVICE OF

JUNE TEENTH

Memorial Day

Privacy · Consumer Health Privacy · Terms · Advertising · Ad Choices · Cookies · More · Meta © 2024

**Bryan County, Georgia**  
July 18 at 6:30 PM · 🌐

We are aware of some information circulating on social media that may raise concerns about the current state of the Bryan County Emergency Services Department. While we respect the right of individuals to express themselves freely, we want to address and dispel any inaccuracies to reassure our community that our Fire, EMS, and EMA divisions are fully prepared and committed to serving and protecting you.

Bryan County deeply values the sacrifices of its emergency services empl... See more

**Bryan County Government**

Summer Williams Patterson, Javier Flores and 60 others 16 shares

Like Share

Bryan County, Georgia limited who can comment on this post.

**Bryan County, Georgia**  
July 17 at 9:31 AM · 🌐

https://www.facebook.com/photo/?fbid=934698202031146&set=a.231689032342070&\_\_cft\_\_[0]=AZXBKBZQMUSbFamE6ilgWpIPHK90JF0FISlXjsDKPZynqmnQ3tY9RrRdio5Aa579-lRIOAq7H6gRK7hax-PfCgGcDgJvruzWFOE7Ez9-Hgmi3bjEewg1R6...

*EXHIBIT B*

**Bryan County Fire & Emergency Services**  
Saving Lives and Protecting Property of Bryan County!

**Page** · Government organization

15759 Highway 144, Richmond Hill, GA, United States, Georgia

(912) 756-1982

bryancountyemergencyservices@gmail.com

bryancountyfireems

bryancountyga.org/government/departments-a-g/emergency-services

Always open

Price Range · \$

**Photos** See all photos

**TORNADO WATCH VS. WARNING**

**WATCH**  
Be prepared in a tornado is possible  
Check weather reports  
Stay indoors  
Avoid windows  
If you are outdoors, seek shelter

**WARNING**  
Take action - a tornado is imminent  
Stay indoors  
Avoid windows  
If you are outdoors, seek shelter

**5 DE MAYO**

**Bryan County Fire & Emergency Services**  
July 26 at 9:44 PM · 🌩️

This evening (July 26, 2024) a fast moving thunderstorm moved into the area around 1830. A tornado watch was issued for southeast Bryan County. Following that, a tornado warning was issued around 1845 hours and was in place until 1930 hours. The warning was briefly extended until 2000 hours but was cancelled before it expired.

As a result of the storm, BCFES was only dispatched to one storm related call for a large pine limb down on Montuak Drive. It was quickly removed with no damage to property or life. No other damage has been reported.

91 21 comments 11 shares

Like Share

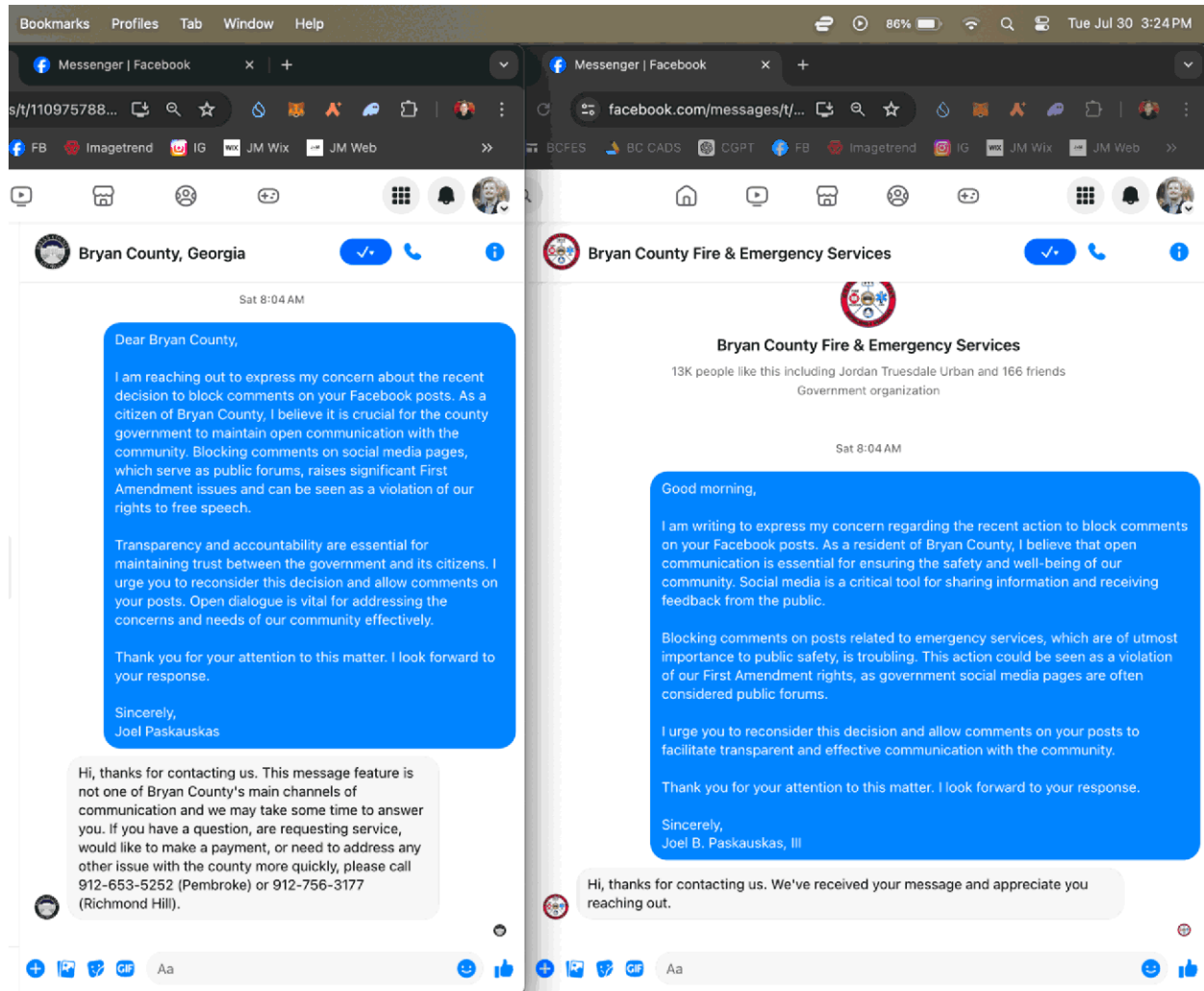
Bryan County Fire & Emergency Services limited who can comment on this post.

View more comments

**We The People of Bryan County**  
Thank you for the after event update. However, the lack of timely communication across all channels, especially social media, during a severe weather event is unacceptable. Residents rely on multiple sources for critical updates, and it's crucial that ... See more

3d Like Reply

**Elena Kelly Nock**  
We The People of Bryan County yes I rely on the severe weather alerts on my phone! We had a tornado come thru 2 years ago as well as straight line winds last year  
This is an enormous failure of our safety!... See more

*Exhibit C*

*Exhibit D*